

Hon. John H. Chun

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

Mr. Kurt A. Benshoof, A.R.W. By and Through  
His Father, Mr. Kurt A. Benshoof, Brett  
Fountain, Urve Maggitti,

## Plaintiffs.

No. 2:24-CV-00808-JHC

## DECLARATION OF DALLAS LEPIERRE

VS.

ANDREA CHIN, ANTHONY BELGARD,  
DONOVAN BROUSSARD, NATHAN  
CLIBER, CATHERINE CORNWALL,  
GREGG CURTIS, JANE DOE, JENNY  
DURKAN, JOHN DUUS, NICHOLAS  
EVANS, PASCAL HERZER, RYAN ELLIS,  
MICHAEL FOX, TYLER GOSLIN, JULIE  
KLINE, ERNEST JENSEN, JONATHAN  
KIEHN, SPENCER KURZ, MAGALIE  
LERMAN, RICHARD LIMA, ADAM  
LOSLEBEN, YVES LUC, SARAH  
MACDONALD, JACOB MASTERSON,  
GRANT MAYER, STEVEN MITCHELL,  
JOHNATHAN MUSSEAU, BREHON NESS,  
LILIYA NESTERUK, STEPHEN  
OKRUHLICA, KATRINA OUTLAND,  
JESSICA OWEN, SARAH PENDLETON,  
DWAYNE PIRAK, BRIAN REES, BLAIR  
RUSS, JULIE SALLE, DANIEL SCHILLING,  
TY SELFRIDGE, NATHAN SHOPAY,  
STEVEN STONE, MICHAEL TRACY,  
MELANIE TRATNIK, SARAH TURNER,  
TREVOR TYLER, MICHAEL VIRGILIO,  
ANDREW WEST, CHAD ZENTNER, In Thei

DECLARATION OF DALLAS LEPIERRE - 1  
2:24-CV-00808-JHC

**Ann Davison**  
Seattle City Attorney  
701 5th Avenue, Suite 2050  
Seattle, WA 98104-7095  
(206) 684-8200

1 Individual Capacities, CITY OF SEATTLE,  
2 KING COUNTY,

3 Defendants.  
4

5 I, DALLAS LEPIERRE, being familiar with the facts set forth herein based on my personal  
6 knowledge, and being competent to testify, hereby declare under penalty of perjury that the  
7 following is true and correct:

- 8 1. I am over the age of 18 and am competent to make this declaration.
- 9 2. All of the summons and complaints purportedly served on the City Defendants are being  
10 collected at this time.
- 11 3. Attached hereto as **Exhibit A** are true and correct copies of all such summons and  
12 complaints as have been currently gathered.
- 13 4. I am aware of no summons and complaint served on any City Defendant that had the  
14 summons properly signed and sealed.

15 Further the declarant sayeth naught.

16 I declare under penalty of perjury that the foregoing is true and correct.

17 DATED this 23rd day of May, 2025.

18  
19 By: /s/ Dallas LePierre  
20 Dallas LePierre, WSBA# 47391  
21 Assistant City Attorney  
22 E-mail: Dallas.LePierre@seattle.gov

23 Seattle City Attorney's Office  
701 Fifth Avenue, Suite 2050  
Seattle, WA 98104  
Phone: (206) 684-8200

*Attorney for Defendant City of Seattle*

1  
2  
3  
CERTIFICATE OF SERVICE4  
5  
I certify that on the 23rd day of May, 2025, I caused a true and correct copy of this document  
6  
to be served on the following in the manner indicated below:  
7

Kurt Alden Benshoof, DOC #448305 Washington Corrections Center (WCC) PO Box 900 Shelton, WA 98584  <i>[Pro Se Plaintiff]</i>	<input checked="" type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> CM/ECF <input type="checkbox"/> ABC Legal Messengers <input type="checkbox"/> Faxed <input type="checkbox"/> Via Email: <a href="mailto:kurtbenshoof@gmail.com">kurtbenshoof@gmail.com</a> ; <a href="mailto:kurtbenshoof1@gmail.com">kurtbenshoof1@gmail.com</a> <a href="mailto:DOCWCCInmateFederal@DOC1.WA.GOV">DOCWCCInmateFederal@DOC1.WA.GOV</a>
Brett Fountain 2100 West Northwest Highway 114 #1115 Grapevine, TX 76051-7808  <i>[Pro Se Plaintiff]</i>	<input checked="" type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> CM/ECF <input type="checkbox"/> ABC Legal Messengers <input type="checkbox"/> Faxed <input type="checkbox"/> Via Email: <a href="mailto:kb407@exposelegalcorruption.com">kb407@exposelegalcorruption.com</a>
Urvé Maggitti 244 Blackburn Drive Berwyn, PA 19312 917-340-0561  <i>[Pro Se Plaintiff]</i>	<input type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> CM/ECF <input type="checkbox"/> ABC Legal Messengers <input type="checkbox"/> Faxed <input type="checkbox"/> Via Email: <a href="mailto:urve.maggitti@gmail.com">urve.maggitti@gmail.com</a>
Matthew Coughlan Darren Anthony Feider Monica Ghosh SEBRIS BUSTO JAMES 15375 SE 30TH Pl, Ste 310 Bellevue, WA 98007 425-450-3382  <i>[Attorney for Fox, Goslin, Mitchell]</i>	<input type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> CM/ECF <input type="checkbox"/> ABC Legal Messengers <input type="checkbox"/> Faxed <input type="checkbox"/> Via Email: <a href="mailto:mcoughlan@sbj.law">mcoughlan@sbj.law</a>
Arick S. Bonsztyk 1000 Second Avenue, Suite 3660 Seattle, WA 98104 206-621-1871  <i>[Jessica Owen]</i>	<input type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> CM/ECF <input type="checkbox"/> ABC Legal Messengers <input type="checkbox"/> Faxed <input type="checkbox"/> Via Email: <a href="mailto:asb@tbr-law.com">asb@tbr-law.com</a>

1 Peggy C. Wu 2 KING COUNTY PROSECUTING 3 ATTORNEY'S OFFICE 4 701 Fifth Avenue, Suite 600 5 Seattle, WA 98104 206-263-4008  6 <i>[King County, Catherine Cornwall, and</i> 7 <i>Pascal Herzer]</i>	<input type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> CM/ECF <input type="checkbox"/> ABC Legal Messengers <input type="checkbox"/> Faxed <input type="checkbox"/> Via Email: <a href="mailto:pwu@kingcounty.gov">pwu@kingcounty.gov</a>
6 Howard Brown 7 1003 West Michigan Street Hammon, LA 70401  8 <i>[Pro Se Interested Party]</i>	<input type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> CM/ECF <input type="checkbox"/> ABC Legal Messengers <input type="checkbox"/> Faxed <input type="checkbox"/> Via Email:

9  
10 /s/ Grace Selsor  
11 Grace Selsor, Legal Assistant